

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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ELSEVIER INC., BLACKWELL PUBLISHING, LTD.,	:
WILEY PERIODICALS, INC., WILEY-LISS, INC.,	:
INFORMA UK LTD., INFORMA USA, INC. and	:
AMERICAN CHEMICAL SOCIETY,	:
	:
Plaintiffs,	:
-against-	:
	:
W.H.P.R., INC., RICHARD B. HAYAT, RANDI	:
HAYAT, EDUCO PERIODICALS CO., INC.,	:
BARBARA PESSINA, RUSSELL PESSINA, PATRICIA	:
ANSPACH, THOMAS ANSPACH, KLAVDIYA A.	:
LOKSHINA and JOHN DOE NOS. 1-50,	:
	:
Defendants.	:
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No. 09 Civ. 6512  
(ECF)

**NOTICE OF  
MOTION**

**NOTICE OF MOTION TO DISMISS COMPLAINT AGAINST DEFENDANT  
KLAVDIYA A. LOKSHINA**

PLEASE TAKE NOTICE that, upon the attached Memorandum of Law and all prior pleadings and proceedings had herein, Defendant Klavdiya A. Lokshina will move this Court, before the Honorable Colleen McMahon, in Courtroom 14A of the United States Courthouse located at 500 Pearl Street, New York, New York 10007, at a time and date to be determined by the Court, for an order dismissing all claims against her in this action pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure.

Dated: New York, New York  
October 7, 2009

Respectfully submitted,

By: /s/ Michael C. Rakower

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